

Western Power Wholesale Electricity Market

Procedure Change Report:
NEPC_2025_02 Technical Requirements
for Standard Small User Facilities

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1. Background

The publication of this Procedure Change Report and the accompanying Wholesale Electricity Market Procedure (**WEM Procedure**) completes the Procedure Change Process conducted by Western Power to consider proposed amendments to the newly developed WEM Procedure: Technical Requirements for Standard Small User Facilities (**the Procedure**) under the Electricity System and Market Rules (**ESM Rules**).

Clause 3.25.2 of the ESM Rules requires that Western Power, as the Distribution System Operator (**DSO**), must document in a WEM Procedure the technical requirements for a Standard Small User Facility.

Western Power must publish, together with the final WEM Procedure, a summary of the submissions received and the response of Western Power to issues raised in those submissions under section 2.10 of the ESM Rules.

1.1 Procedure change process and timetable

On the 25th November 2025 Western Power published the Procedure Change Proposal NEPC_2025_02 and issued a call for submissions. The proposal was progressed using the Procedure Change Process outlined in section 2.10 of the ESM Rules with submissions required by 5th January 2026, allowing for a consultation period of more than 20 Business Days.

Table 1.1: “Summary of Procedure Change Process timeline”

Process stage	Date
Publication of Procedure Change Proposal	25 November 2025
Closing date for submissions on the Procedure Change Proposal	05 January 2026
Publication of Procedure Change Report	29 January 2026
Commencement of amended Procedure, in alignment with ESM Rules Clause 1.71.1	01 May 2026

2. Proposed Procedure Change

2.1 Detail of the proposed procedure change

Western Power has developed the new Procedure to:

- Transition governance of these Facilities to the ESM Rules framework, which underpins improved compliance for these Facilities and supports power system security and reliability.
- Improve clarity of the technical requirements for these Facilities, in particular:
 - Aggregate rated maximum capacity limits of the Inverter Energy Systems in the Facility
 - Maximum generation limit for the Facility
 - Injection limits for the Facility
 - Compliance with AS/NZS 4777.2
 - Remote disconnection

Written submissions on the draft Procedure were invited, and we welcomed suggestions to further enhance the Procedure or better support the State Electricity Objective, as outlined in section 3A of the Electricity Industry Act 2004. This update ensures compliance with clause 3.25.2 of the ESM Rules that came into effect on 01 January 2026.

2.2 Proposed drafting

Western Power published a draft of the Procedure for consultation, alongside a Procedure Change Proposal, on Western Power's website.

These documents, and the amended Procedure, are currently available at "[Community consultation](https://www.westernpower.com.au/about/community/community-consultation/#id2DC25273F3AC56628ED778460CC9CEE1DC1274F2A579A045788563B6427F836)"¹ link and may transition to the following link "[The Wholesale Electricity Market and Market Information Management](https://www.westernpower.com.au/about/what-we-do/regulation/the-wholesale-electricity-market/)"² over time.

¹ <https://www.westernpower.com.au/about/community/community-consultation/#id2DC25273F3AC56628ED778460CC9CEE1DC1274F2A579A045788563B6427F836>

² <https://www.westernpower.com.au/about/what-we-do/regulation/the-wholesale-electricity-market/>

3. Consultation process

3.1 Market Advisory Committee

In accordance with the Coordinator's WEM Procedure: Procedure Administration, Western Power notified all members of the Market Advisory Committee (**MAC**) of the publication of the Procedure Change Proposal within one Business Day of publishing the Procedure Change Proposal.

A response was not received from the MAC and a MAC Meeting was not convened.

3.2 Submissions received during consultation period

Western Power published the Procedure Change Proposal on 25th November 2025 and invited stakeholders to provide submissions on the proposed amendments before the closing date of 5th January 2026.

Western Power received one (1) submission from Synergy on the proposed Procedure and incorporated feedback from this submission into Procedure. Submissions received are available at [Community consultation](#)³.

A summary of the submission and Western Power's responses are in Table 3.1.

Table 3.1: "Summary of stakeholder feedback and Western Power responses"

Respondent	WEM Procedure section	Summary of feedback	Western Power response
Synergy	General comments for consideration - Network operator transfer of network safety connection obligations to Market Participant	Synergy notes that current drafting could be interpreted such that the obligation for ensuring network safety at the time of connection is on the Market Participant rather than Western Power. Synergy suggests that the WEM Procedure clarifies this.	As per existing legislation Western Power remains accountable for network and electrical safety. The WEM Procedure prescribes technical requirements for Standard Small User Facilities, compliance with which will support Western Power in ensuring network safety is maintained. Western Power has updated the WEM Procedure to include Clause 2.1.2 clarifying that ' <i>Only IES that have been assessed and approved by Western Power shall be installed.</i> '
Synergy	General comments for consideration - Reference to Related Documents	Synergy suggests updating the WEM Procedure to provide clarity on hierarchy or related documents, including which instruments prevail in the event of inconsistencies.	Western Power has updated the WEM Procedure to: <ul style="list-style-type: none">• Include the Technical Rules as a Related Document, and• Note that the WEM Procedure prevails over the Basic Embedded Generator Connection Technical Requirements (Basic EG CTR) in the event of any inconsistencies.

³ <https://www.westernpower.com.au/about/community/community-consultation/#id2DC25273F3AC56628ED778460CC9CEE1DC1274F2A579A045788563B6427F836>

Respondent	WEM Procedure section	Summary of feedback	Western Power response
Synergy	General comments for consideration - Generation Limits with Relation to Injection Limits	Synergy requests clarification on the tables covering Maximum capacity, Generation and Injection limits per Network Topology	<p>Western Power considers that Explanatory Note 4 assists with the interpretation of Table 3.1, 3.2 and 3.3.</p> <p>For additional clarity, one possible configuration is a Standard Small User Facility that is connected to a single-phase Standard Connection Service in a Large LV network, could have:</p> <ul style="list-style-type: none"> • An aggregate rated IES capacity of 30kVA • A Generation limit of 15kVA • An Injection limit of 5kW, if the remote communication and control requirement outlined in the WEM Procedure is met and there is available network capacity
Synergy	General comments for consideration - Generation Limits with Relation to Injection Limits	Synergy suggests updating the WEM Procedure to provide clarity on communication of network constraints and injection limits.	<p>Western Power will provide the Injection limit during the connections process and the Standard Small User Facility is to comply with this limit, unless an alternative is agreed with Western Power.</p> <p>The development and communication of alternative Injection limits, such as Dynamic Operating Envelopes (DOEs), are being progressed through Project Jupiter.</p>
Synergy	General comments for consideration - Common Smart Inverter Profile – Australia (CSIP-AUS) Requirement	Synergy suggests updating the WEM Procedure to specify a remote communication and control protocol for non-contestable customers, specifically CSIP-AUS v1.2 (TS5573).	<p>Western Power does not specify a mandatory method for remote communication and control, however has updated the WEM Procedure to provide more detail on this matter. Including:</p> <ul style="list-style-type: none"> • Additional Clause 3.4.4 about communications method to be approved by Western Power • An Explanatory Note recognising that Energy Policy WA has indicated that CSIP-AUS will be used for non-contestable customer Distributed Energy Resources (DER) in the South-West Interconnected System (SWIS)

Respondent	WEM Procedure section	Summary of feedback	Western Power response
Synergy	General comments for consideration - Broad References	Synergy suggest an explanatory note is included advising Industry that the WEM Procedure provides Market Participants the ability to pass on these obligations for Industry.	Western Power considers that commenting on the approach of Market Participants to pass on the obligations of the WEM Procedure is outside of the scope defined in the ESM Rules. However, Western Power recognises that clarity for industry is important for compliance with the WEM Procedure. As such, Western Power is updating the Basic EG CTR in parallel to assist industry.
Synergy	Explanatory Note(s)	Synergy considers that Explanatory Notes will be removed when the final WEM Procedure is published.	Explanatory Notes will remain in the WEM Procedure.
Synergy	Clause 2.2.1 - A Standard Connection Service is defined in the WASIR	Synergy suggests clarifying that the Standard Connection Service as defined in the WASIR is a 'Western Power Standard Connection Service'	Western Power has updated the WEM Procedure to reflect that a Standard Connection Service is a Western Power Standard Connection Service.
Synergy	Clause 3.1.2 - For multiple-phase Standard Connection Services the IES generation in the Standard Small User Facility must be balanced and meet the power system performance standards specified in Section 2.2 of the Technical Rules and Appendix 13 of the ESM Rules.	TR Cl 3.7.2 requires the NSP (WP) to assess IES performance against TR Cl 2.2. Synergy requests clarity whether the WEM Procedure requirement of 3.1.2 is intended to be met by WP, or is passing the obligation to the Market Participant.	Western Power will continue to meet its obligations in the regulatory framework, including those in the Technical Rules.
Synergy	Clauses 3.1.3 and 3.1.4 which relate to maximum phase imbalance limits of IES on three-phase and split-phase connections	Synergy consider that the current drafting requires them to monitor the compliance of phase imbalance but considers that the responsibility and capability for monitoring of this is the responsibility of the DSO and has provided recommend drafting to use in the WEM Procedure.	The WEM Procedure outlines the technical requirements to be met by the Standard Small User Facility, including for phase imbalance. Compliance will be managed in accordance with the DER Compliance Framework.

Respondent	WEM Procedure section	Summary of feedback	Western Power response
Synergy	3.2.2 - The maximum generation limit of the Standard Small User Facility may be further reduced based on the network topology where the IES may not allow the power system performance standards specified in Section 2.2 of the Technical Rules and Appendix 13 of the ESM Rules to be met.	Synergy suggests that the Technical Rules is included 1.4 (Related documents) so that readers are aware of the associated documentation.	Western Power has updated the WEM Procedure to include the Technical Rules in Section 1.4.
Synergy	3.3.1 - The design of an IES within a Standard Small User Facility must be in accordance with all statutory requirements, the requirements of this document, WASIR, relevant Australian Standards and good electricity industry practice	Synergy considers that 'statutory requirements' is vague and suggests that 3.3.1 is amended to articulate specific requirements or documents.	Statutory requirements are not outlined in detail, in part as they will evolve over time. For convenience relevant documentation (such as Technical Rules, Basic EG CTR) have been referenced to assist the reader.
Synergy	3.3.2 - The Standard Small User Facility must only use inverters that have a type-test report or type-test certificate from an independent and recognised certification body showing compliance of the inverter with AS/NZS 4777.2. Evidence of this must be supplied to the Western Power on request.	Synergy suggests providing clarity as to which entity is responsible for providing and holding the required certification. Synergy has proposed that the Accreditation Provider is to supply the certification upon request.	The WEM Procedure applies to Market Participants and, consistent with the ESM Rules framework, Western Power is not empowered to nominate an alternative. In conjunction with Synergy, Western Power is currently planning and designing a DER connections process redesign and in collaboration with Synergy there will be and expectation and opportunity to improve compliance.

4. Further changes to the Procedure

4.1 Changes after consultation

In addition to changes to the Procedure as a result of stakeholder feedback, Western Power made the following changes:

- Various minor updates to align with updated Tranche 9 Amending Rules, reflect updated dates, ensure consistency of terminology and correct typographical errors.

5. Western Power Assessment

5.1 Consistency with Electricity Industry Act 2004, ESM Regulations, ESM Rules and State Electricity Objective

Western Power considers that the Procedure is consistent with the:

- Electricity Industry Act 2004 (WA),
- ESM Regulations,
- ESM Rules; and
- State Electricity Objective.

5.2 Proposed date and time of the commencement of the Procedure

In alignment with ESM Rules Clause 1.71.1, the Procedure will commence at 8:00 am 1st May 2026. This provides approximately three months from the date of publication of this Procedure Change Report for Rule Participants to implement any changes required.